

REMARKS/ARGUMENTS

Overview of the Office Action

Claims 1, 2, 8-9, 15-16, 18-20, and 22-27 were rejected under 35 U.S.C. § 102(b) as being anticipated by Chainini et al. (U.S. Patent No. 5,760,788).

Claims 3-7, 21, and 28 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Chainini in view of Washburn et al. (U.S. Patent No. 5,157,779).

Claims 10 and 17 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Chainini in view of Flansburg et al. (U.S. Patent No. 6,393,432).

Claims 11-12 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Chainini in view of Flansburg in further view of Williamson et al. (U.S. Patent No. 6,122,641) in further view of Peddada et al. (U.S. Patent No. 6,031,533).

Claim 13 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Chainini in view of Gupta et al. (U.S. Patent No. 6,484,156).

Claim 14 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Chainini in view of Gupta in further view of O'Donnell et al. (U.S. Patent No. 6,223,203).

Status of the Claims/Amendments

Claims 10 and 11 have been canceled without prejudice to Applicants' rights to pursue said claims in a separate application (or to reintroduce said claims in the present Application).

Claims 1, 12, 15, and 22 have been amended. Claims 1-9 and 12-28 are pending.

Explanation of Claims Amended and Canceled

To further prosecution, and without conceding the appropriateness of the rejections of any pre-amended claims in the present Application, Applicants have canceled Claims 10-11 and amended Claims 1, 12, 15, and 22 to effectively narrow prosecution to the subject matter embodied by original Claim 11 which was rejected by the Examiner on a combination of four patent references. For subject matter from the pre-amended claims that is no longer embodied in the present as-amended claims, said amendments and cancellations are explicitly intended to be made without prejudice to Applicants rights to pursue said subject matter and claims in a separate application (or again in the present application).

Claims Rejected Under 35 U.S.C. § 102(b) and 103(a)

Claims 1, 2, 8-9, 15-16, 18-20, and 22-27 were rejected under 35 U.S.C. § 102(b) as being anticipated by Chainini et al. (U.S. Patent No. 5,760,788). Claims 3-7, 21, and 28 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Chainini in view of Washburn et al. (U.S. Patent No. 5,157,779). Claims 10 and 17 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Chainini in view of Flansburg et al. (U.S. Patent No. 6,393,432). Claim 13 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Chainini in view of Gupta et al. (U.S. Patent No. 6,484,156). Claim 14 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Chainini in view of Gupta in further view of O'Donnell et al. (U.S. Patent No. 6,223,203). In response, independent Claims 1, 15, and 22 have been amended to include the limitations of canceled Claims 10 and 11. Since Claim 11 depended upon Claim 10, and Claim 10 depended upon Claim 1, Applicants respectfully submit that amended Claims 1, 15, and 22 and the dependent claims that depend therefrom (collectively, all pending amended claims)

effectively stand rejected on the same basis as canceled Claim 11 and that the other bases for rejection are hereby rendered moot in light of Applicants amendments without the Applicants in any way conceding the appropriateness of said moot rejections.

In order to establish a prima facie case of obviousness, three basic criteria must be met. First there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second there must be a reasonable expectation of success. Finally the prior art reference (or references when combined) must teach or suggest all the claim elements. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art and cannot be based on applicant's disclosure. (MPEP §§ 2142, 2143.)

Claims 11-12 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Chainini in view of Flansburg in further view of Williamson et al. (U.S. Patent No. 6,122,641) in further view of Peddada et al. (U.S. Patent No. 6,031,533). However, Applicants respectfully submit that the suggestion or motivation to combine Chainini and Flansburg and Williamson and Peddada is unsupported by said references or the general art and, thus, cannot properly constitute a basis for rejection of Claim 11. Since amended independent Claims 1, 15, and 22 now include the explicit and implied limitations of Claim 11, and since all dependent claims are dependent upon Claim 1, 15, or 22, Applicants respectfully submit that the combination of Chainini and Flansburg and Williamson and Peddada is also insufficient as to those claims.

Chainini is directed to a "graphical programming application is provided that is intended to be run under a graphic user interface operating system" (Chainini, Abstract, lines 1-4) but, as

conceded by the Examiner, Chainini does not teach or suggest “the graphical object representing a database object” (Third Office Action, section 7, pages 8-9). To overcome this shortcoming, the Examiner cites Flansburg (id. at page 9) which is directed to a “method and system in accordance with the present invention for automatically updating graphical diagrams of logical network layouts” (Flansburg, Abstract, lines 1-3). However, Flansburg lacks any suggestion or motivation to apply its teachings to a graphical programming application and, as effectively conceded by the Examiner, Chainini lacks any suggestion or motivation to incorporate the teachings of Flansburg to graphically represent a database object. The only suggestion or motivation provided by the Examiner to combine said references is apparently “because the combination allows graphical objects to be created, edited, and stored throughout a network thus providing flexibility and efficiency” (Third Office Action, section 7, page 9); however, the teaching, suggestion, or motivation to make this combination for this reason is not found in either reference and is apparently based solely on applicants’ disclosure—and is thus improper.

In addition, the Examiner has conceded that “neither Chainini nor Flansburg teaches the implementation of a database column bound to a variable” (Third Office Action, section 8, page 10). To overcome this shortcoming, the Examiner cites Williamson (id.) which is directed to “a model that maps object classes in an object-oriented environment to a data source” (Williamson, Abstract, lines 1-3). However, Williamson lacks any suggestion or motivation to apply its teachings to either a graphical programming application (Chainini) or graphical representation of a database object (Flansburg) and, as effectively conceded by the Examiner, the combination of Chainini and Flansburg lacks any suggestion or motivation to incorporate the teachings of Williamson to implementation of a database column and much less one bound to a variable. The

only suggestion or motivation provided by the Examiner to combine said references is apparently “because the modification provides the ability to efficiently map properties of the objects from the columns of the database to the displayed object” (Third Office Action, section 8, page 10); however, the teaching, suggestion, or motivation to make this combination for this reason is not found in either reference and is apparently based solely on applicants’ disclosure—and thus is also improper.

Moreover, the Examiner has also conceded that “[n]either Chainini, Flansburg, or Williamson teaches the use of a drag-and-drop interface” (Third Office Action, section 8, page 10). To overcome this shortcoming, the Examiner cites Peddada (id.) which is directed to “a model that maps object classes in an object-oriented environment to a data source” (Williamson, Abstract, lines 1-3) which allegedly suggests the utilization of a drag-and-drop interface. However, Peddada does not in fact “teach[] a drag-and-drop interface to bind a graphics object to a program” as the Examiner suggests as Peddada only teaches at most “a graphic object identifying the software program is displayed, the graphic object being user selectable to execute the execution version of the software program” which, as known and appreciated by those of skill in the art, is distinguishable and non-analogous functionality. Therefore, Peddada lacks any suggestion or motivation to apply its teachings to none of (a) a graphical programming application (Chainini), (b) a graphical representation of a database object (Flansburg) and (c) implementation of a database column bound to a variable. Furthermore, as effectively conceded by the Examiner, the combination of Chainini and Flansburg and Williamson lacks any suggestion or motivation to incorporate the teachings of Peddada to utilize a drag-and-drop interface to bind a graphics object to a program. The only suggestion or motivation provided by

the Examiner to combine said references is apparently “because the drag-and-drop feature further simplifies the programming function for users with little or not programming experience” (Third Office Action, section 7, page 10); however, the teaching, suggestion, or motivation to make this combination for this reason is not found in either reference and is apparently based solely on applicants’ disclosure—and thus is once again improper.

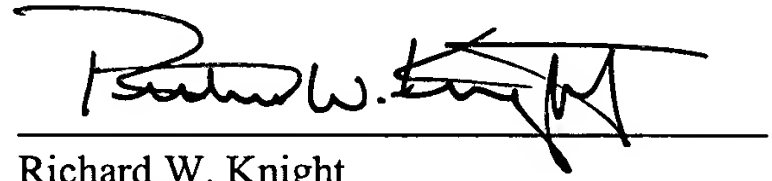
With regard to the first criteria for establishing a prima facie case of obviousness, the lack of suggestion or motivation—either in the references themselves or in the knowledge generally available to one of ordinary skill in the art—to modify the reference or to combine reference teachings as implied by the Examiner is unfounded and, in fact, the only teaching or suggestions to make the four-reference combination applicant’s disclosure and not found in the prior art cited. Therefore, Applicants respectfully submit that the rejection as to Claim 11 is improper and is traversed by the analysis herein as the suggestion or motivation to combine all of Chainini and Flansburg and Williamson and Peddada is unsupported by said references or the general art and, thus, cannot properly constitute a basis for rejection of Claim 11. Since amended independent Claims 1, 15, and 22 now include the explicit and implied limitations of Claim 11, and since all dependent claims are dependent upon Claim 1, 15, or 22, Applicants respectfully submit that the combination of Chainini and Flansburg and Williamson and Peddada is also insufficient as to those claims. For these reasons, Applicants respectfully submit that Claims 1-9 and 12-28 are allowable over the prior art and Applicants respectfully request that these claims be allowed to immediately issue.

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CONCLUSION

Based on the reasons and rationale set forth herein, Applicants respectfully submit that—in light of Applicants' amendments and given the absence of a prima facie showing of obviousness in the Office Action as to canceled Claim 11 upon which all remaining claims are now based—the objections and rejections as to the pending claims have been traversed and are no longer valid. Accordingly, Applicants request that the objections and rejections be withdrawn and that the currently pending claims be allowed to issue. Should the Examiner have any questions, comments, or suggestions that would expedite the prosecution of the present case to allowance, Applicants' undersigned representative earnestly requests a telephone conference at (206) 332-1394.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Richard W. Knight", is written over a horizontal line.

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